

July 9, 2001

Mr. Chris Koszewski
Alcan Rolled Products
PO Box 1067
Terre Haute, Indiana 47808

Re: 167-13860
Second Administrative Amendment to
Part 70 167-5988-00001

Dear Mr. Koszewski:

Alcan Rolled Products was issued a permit on June 30, 1999 for production equipment to reduce aluminum rolls into finished foil products. A letter requesting reactivation and modification to rolling mill #16 was received on November 30, 2000. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

1. Addition of Section D.3 which contains all the provisions related to the new operation.
2. Addition of Section D.3 references in the Table of Contents.
3. Addition of the equipment descriptions associated with the new equipment in Section A.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Rob Harmon at (812) 462-3433, ext 14.

Sincerely,

George M. Needham
Director
Vigo County Air Pollution Control

Attachments
RKH

cc: Mindy Hahn - IDEM-OAQ, Permit Branch
Winter Bottum - IDEM-OAQ

PART 70 OPERATING PERMIT

OFFICE OF AIR MANAGEMENT
and
VIGO COUNTY AIR POLLUTION CONTROL

Alcan Rolled Products
5901 North 13th Street
Terre Haute, Indiana 47804

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T167-5988-00001	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 30, 1999
First Administrative Amendment T167-11496	Issuance Date: December 22, 1999
Second Administrative Amendment T167-13860	Pages Affected: 4, 5, 37a, 37b, 37c, 37d
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: July 9, 2001

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Particulate Matter (PM)

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS - Cold Rolling Mill #16

Net Emission Reduction

D.3.1 Removal of Emission Sources

D.3.2 Raw Material Change

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.3 Particulate Matter (PM) [326 IAC 6-3]

D.3.4 Particulate Matter (PM and PM10)

D.3.5 VOC Emissions [326 IAC 8-1-6]

D.3.6 Operating Hours

D.3.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.3.8 Testing Requirements [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.3.9 Particulate Matter and Volatile Organic Compound Control

Record Keeping and Reporting Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.3.10 Record Keeping Requirements

D.3.11 Reporting Requirements

Part 70 Source Modification Certification

Part 70 Source Modification Quarterly Report

Certification Form

Emergency/Deviation Occurrence Report

Natural Gas Fired Certification

Compliance Report Form

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Vigo County Air Pollution Control (VCAPC). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary source which consists of production equipment to reduce aluminum rolls into finished foil products.

Responsible Official: **Chris Koszewski**
Source Address: **5901 North 13th Street, Terre Haute, Indiana, 47804**
Mailing Address: **PO Box 1067, Terre Haute, Indiana 47808**
SIC Code: **3353**
County Location: **Vigo**
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) FP1 Rolling Mill, manufactured by Achenbach, identified as unit 001, with a maximum capacity of 146,120 pounds per hour of aluminum, using a mist eliminator as control, and exhausting to stack 001.
- (2) Rolling Mill #15, manufactured by Pittsburg, identified as unit 002, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 002.
- (3) ~~Rolling Mill #16, manufactured by Pittsburg, identified as unit 003, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 003.~~ Rolling mill #16 (being reactivated and modified after an extended shutdown), with a maximum capacity of 52,000 pounds of aluminum sheet per hour (capable of doubling operations), using a mist eliminator for control, and exhausting to stack 003.
- (4) Rolling Mill #19, manufactured by Loewy Robertson, identified as unit 004, with a maximum capacity of 34,400 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 004.
- (5) Rolling Mill #20, manufactured by Loewy Robertson, identified as unit 005, with a maximum capacity of 28,700 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 005.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Rolling mill #16 (being reactivated and modified after an extended shutdown), with a maximum capacity of 52,000 pounds of aluminum sheet per hour (capable of doubling operations), using a mist eliminator for control, and exhausting to stack 003.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Net Emission Reduction

D.3.1 Removal of Emission Sources

Mill #15 must be permanently removed from service (prior to full time operation of Mill #16) in order to provide necessary emission credits to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. The full time operation does not include a shakedown period for the new unit. This shakedown period shall not exceed six (6) months. During this shakedown period Mill #15 and Mill #16 shall not operate more than a combined 168 hours per week (starting on the first day of the shakedown period). This limitation is needed because Alcan is relying on the emission reduction from Mill #15 in order to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. This limitation effectively limits the total emissions because the new Mill #16 is larger than the old Mill #15.

D.3.2 Raw Material Change

Existing Mill #20 shall be permanently converted from utilizing mineral spirits as the raw material for the "doubling process" to utilizing Norpar 13 (or equivalent) for that purpose prior to any operation of Mill #16. This change provides necessary emission credits to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from Mill #16 shall not exceed 36.4 pounds per hour.

The pounds per hour limitation was calculated using a process weight rate of 52,000 pounds per hour and the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where **E** = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.4 Particulate Matter (PM and PM10)

The determination that this approval did not trigger a Prevention of Significant Deterioration (PSD) review was made using specific estimates of both PM and PM10 emission rates. In order for that determination to remain valid, the emissions must remain at or below those estimated rates. Therefore, the emissions are limited as follows:

The PM emissions shall not exceed 6.0 tons per year.

The PM10 emissions (including both filterable and condensible particulate matter (PM10)) shall not exceed 19.2 tons per year.

D.3.5 VOC Emissions (326 IAC 8-1-6)

Pursuant to 326 IAC 8-1-6, this facility shall install and operate BACT for VOC emissions. In this case BACT has been determined to be a combination of utilizing a low volatility oil (Norpar 13 or equivalent) and a control device (mist eliminator - controlling droplet phase VOC mist (PM) emissions (down to 1 micron) by 75%).

D.3.6 Operating Hours

The Permittee shall limit the operation of rolling mill #16 to no more than 8000 hours per 12 consecutive month period, rolled monthly.

D.3.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and control devices.

Compliance Determination Requirements

D.3.8 Testing Requirements [326 IAC 3-6]

The Permittee shall perform PM, PM-10, and VOC testing on the Mist Elimination system outlet, utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. The Permittee shall also perform droplet phase VOC (PM) testing on both the inlet and outlet of the mist eliminator. The testing shall be completed within sixty (60) days of achieving maximum production rates, but not more than one hundred eighty (180) days after initial operation. The PM10 and total VOC testing is not intended for compliance purposes, it is to verify the accuracy of the emission estimates upon which this approval was based. Therefore, the test does not have to be repeated every five years. PM-10 includes filterable and condensable PM-10. The droplet VOC (PM) collection efficiency is a requirement of the BACT determination and it must be completed at least once every 5 years. In addition to these requirements, IDEM and VCAPC may require compliance testing when necessary to determine if the emissions unit is in compliance.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.9 Particulate Matter and Volatile Organic Compound Control

The mist eliminator for control shall be in operation at all times when Cold Rolling Mill #16 is in operation.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.10 Record Keeping Requirements

- (a) To document compliance with Condition D.3.6, the Permittee shall maintain records of the hours of operation of rolling mill #16. Records maintained shall be taken daily and compiled monthly and shall be complete and sufficient to establish compliance with the operating time limitation established in Condition D.3.6.
- (b) To document compliance with Condition D.3.1 (during the shakedown period only), the Permittee shall maintain records of the weekly hours of operation of rolling mill #15, rolling mill #16, and the combined total. Records maintained shall be taken daily and compiled weekly and shall be complete and sufficient to establish compliance with the operating time limitation established in Condition D.3.1.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.6 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: Alcan Rolled Products
Source Address: 5901 North 13th Street, Terre Haute, Indiana 47805
Mailing Address: PO Box 1607, Terre Haute, Indiana 47808
Source Modification No.: 167-12146-00001

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Source Modification Quarterly Report

Source Name: Alcan Rolled Products
Source Address: 5901 North 13th Street, Terre Haute, Indiana 47805
Mailing Address: PO Box 1607, Terre Haute, Indiana 47808
Source Modification No.: 167-12146-00001
Facility: Rolling Mill #16
Parameter: Operating hours
Limit: Shall not exceed 8000 hours per 12 month period, rolled monthly

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____